

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5

March 27, 2008

REPLY TO THE ATTENTION OF.

SR-6J

<u>Via Certified Mail</u> Return Receipt Requested

Thomas Steib Detrex Corporation 1100 N. State Road Ashtabula, OH 44004

RE: Request for Participation in Remedy Evaluation Process

Requirement for Preparation of Updated Operations, Maintenance & Monitoring Plan Requirement for Preparation of Work Plan for the Removal of DNAPL and DNAPL-impacted Soil and Sediment in the DS-Tributary

Detrex Source Control Operable Unit - Fields Brook Superfund Site - Ashtabula, Ohio Docket No. - V-W-98-C-450

Dear Mr. Steib:

In preparation for the next Five Year Review and pursuant to Section VIII of the Unilateral Order for Remedial Design/Remedial Action at the Detrex Corporation (Detrex) Operable Unit of the Fields Brook Superfund Site, the United States Environmental Protection Agency (U.S. EPA) will be evaluating the remedy components and the operations, maintenance and monitoring (OM&M) procedures at the Detrex facility to evaluate the scope, effectiveness and protectiveness of the source control remedy. U.S. EPA's review of the remedy may lead to the establishment of cleanup requirements that extend beyond the original requirements of the source control Record of Decision (ROD). Any such additional requirements would, of course, be subject to U.S. EPA's decision-making process, which could include, as appropriate, the issuance of an Explanation of Significant Difference or the pursuit of a ROD Amendment. Because of the potential for changes in the ROD requirements, U.S. EPA is hereby requesting that that Detrex participate in the Five Year Review process by conducting its own review and evaluation of the scope, status and protectiveness of the remedial action components in place and planned for the Detrex Site. Specific issues that U.S. EPA will be evaluating as part of this review include, but are not limited to:

- an analysis of groundwater contaminant concentrations and water level data from along the DS
 Tributary and west / northwest of the facility
- 2. a discussion of slurry wall integrity and what additional groundwater quality and contaminant parameters would be useful for such an evaluation (U.S. EPA's review to date indicates that monitoring parameters should be expanded to include pH, calcium, sodium, and alcohols)
- 3. an evaluation of extraction well performance and efficiency
- 4. a draft schedule for installation of additional extraction wells
- 5. a discussion of the VOCs detected in groundwater collected from the interceptor trench and the potential for such contamination to be from DNAPL movement through the area
- 6. a discussion of the frequency of removal and volume of product seen at the North Sewer sump
- 7. an evaluation of the extent of groundwater contamination and verification that off-site groundwater is not causing any possible human exposures (i.e., municipal or residential wells)
- 8. a review of the status and sufficiency of the institutional control requirements established under the ROD

As noted, U.S. EPA will be conducting this review and is offering Detrex the opportunity to perform its own evaluation and to submit its results and conclusion to the Agency. If Detrex chooses to perform the evaluation, it should contact U.S. EPA so that a technical meeting may be scheduled to coordinate the parties' efforts.

In addition to requesting that Detrex become involved in the remedy evaluation process, U.S. EPA is requiring that Detrex update its OM&M Plan to incorporate new equipment, procedures and environmental data gathered to date. Section IIIA(iii) of the Scope of Work for Remedial Design and Remedial Action identifies the minimal required elements of an OM&M Plan. The items to be addressed within the OM&M Plan are quite broad. Among the many elements, Detrex is tasked with describing potential operating problems, identifying remedies, and providing a justification of monitoring points used to determine compliance with applicable standards. As part of the OM&M Plan, Detrex is also required to conduct an "analysis of vulnerability and additional resource requirements should a failure occur" and should identify a "detailed description of actions to be implemented in the event that applicable standards for groundwater, surface water discharges, or air emissions are exceeded". Thus, many of the issues for consideration in the preparation of the OM&M Plan update will serve as useful "jumping off points" for the evaluation of remedy performance.

Separately, pursuant to Section VII (Work to be Performed) of the above referenced UAO, U.S. EPA is hereby requiring that Detrex move forward to investigate and remove dense non-aqueous phase liquid (DNAPL) and DNAPL-impacted soil and sediment from the DS Tributary and its floodplain. Work should be performed to meet the criteria established in the Fields Brook sediment and floodplain Records of Decision and Explanations of Significant Differences. Based on experience at the Fields Brook site in Exposure Units 6 and 8, soil and sediment borings alone are not sufficient to identify the presence of DNAPL. Therefore, Detrex will need to prepare a work plan for DNAPL investigation and removal that incorporates both sampling and investigational excavation. Borings and excavations should go at least three feet into the clay underlying the sediment and floodplain soils and deeper in areas where structures further penetrate the clay. It is recommended that investigational borings and excavations and DNAPL soil/sediment removal be closely coordinated to eliminate the need to contain exposed areas of DNAPL.

Both the updated OM&M Plan and the Work Plan for the Investigation / Removal of DNAPL from the DS Tributary shall be submitted to U.S. EPA within 60 days of your receipt of this correspondence. The Work Plan should include the detail necessary to move directly to implementation and should include an updated Health and Safety Plan. Because of the complexity of the issues, U.S. EPA recommends that a technical meeting be scheduled to discuss the submittals.

If you have any questions, please contact me at 312-353-6564.

Sincerely,

Terese A. Van Donsel Project Manager Superfund Division U.S. EPA Region 5

cc:

P. Felitti /EPA-R5

R. Williams / OEPA

W. Earle / SulTRAC

T. Doll / Detrex

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Site File - Fields Brook / Detrex